UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

APR 20 2015

CERTIFIED MAIL 7009 1680 0000 7677 9203
RETURN RECEIPT REQUESTED

Ms. Kimberly M. Gamble
Environmental Compliance Engineer
Ford Motor Company – Rawsonville Plant
10300 Textile Road
Ypsilanti, Michigan 48197

Re: Notice of Violation
Compliance Evaluation Inspection
MID005379888

Dear Ms. Gamble:

On January 15, 2015, representatives of the U.S. Environmental Protection Agency and the Michigan Department of Environmental Quality inspected the Ford Motor Company – Rawsonville Plant (Ford Motor - Rawsonville) facility located in Ypsilanti, Michigan. As a large quantity generator of hazardous waste, Ford Motor - Rawsonville is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq*. (RCRA). The purpose of the inspection was to evaluate Ford Motor - Rawsonville's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Ford Motor - Rawsonville, EPA's review of records pertaining to Ford Motor - Rawsonville, and the inspector's observations, EPA has determined that Ford Motor - Rawsonville has unlawfully stored hazardous waste without a license or interim status as a result of Ford Motor - Rawsonville's failure to comply with certain conditions for a license exemption under Mich. Admin. Code. r. 299.9306(1)-(3) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the license exemption conditions with which Ford Motor - Rawsonville was out of compliance at the time of the inspection in paragraph 1, below.

Many of the conditions for a RCRA license exemption are also independent requirements that apply to licensed and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its license exemption due to a failure to comply with an exemption condition incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(p) and (q), the generator: (a) becomes

an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption conditions identified in paragraph 1 is also an independent TSD requirement incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(p) and (q). Accordingly, each failure of Ford Motor - Rawsonville to comply with these conditions is also a violation of the corresponding requirement in in Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(p) and (q) [40 C.F.R. Part 265] (if the facility should have fully complied with the requirements for interim status), or Mich. Admin. Code. r. 299.9601(1) and (2) and 299.11003(1)(m)-(o) [40 C.F.R. Part 264] (if the facility should have been licensed).

Finally, EPA has determined that Ford Motor - Rawsonville violated RCRA requirements related to hazardous waste determinations and recordkeeping, as described in paragraphs 2 and 3, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS

At the time of the inspection, Ford Motor - Rawsonville was out of compliance with the following large quantity generator license exemption condition:

1. Contingency Plan Content

A large quantity generator must ensure its contingency plan includes a list of all emergency equipment at the facility [such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment], where this equipment is required. This list must be kept up to date. In addition, the contingency plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities. *See* Mich. Admin. Code. r. 299.9306(1)(d); 40 C.F.R. 265 Subpart D [40 C.F.R. § 262.34(a)(4) and 40 C.F.R. § 265.52(e)].

During the inspection of records, the review of the facility's contingency plan indicated that there were no descriptions of the capabilities for the gloves that were described in the plan's emergency equipment list.

Summary: By failing to comply with the condition for a license exemption, above, Ford Motor - Rawsonville became an operator of a hazardous waste storage facility, and was required to obtain a Michigan hazardous waste storage license. Ford Motor - Rawsonville failed to apply for such a license. Ford Motor - Rawsonville's failure to apply for and obtain a hazardous waste storage license violated the requirements of Mich. Admin. Code. r. 299.9502(1), 299.9508 and 299.9510 [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a license exemption condition incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(p) and (q) is also an independent violation of the corresponding TSD requirement.

Ford Motor - Rawsonville violated the following generator requirements:

2. Hazardous Waste Determinations

Under Mich. Admin. Code. r. 299.9302(1) [40 C.F.R. § 262.11], a generator must determine whether its waste is hazardous.

At the time of the inspection, Ford Motor - Rawsonville had not made a waste determination that represented the paint usage in both parts washer (WA-01 and WA-02) spent solutions (solvent (naphtha), and aqueous – Armakleen respectively).

3. Hazardous Waste Determination Recordkeeping

Under Mich. Admin. Code. r. 299.9307(1) [40 C.F.R. § 262.40(c)], the generator must keep records of any test results, waste analyses, or other determinations made pursuant to Mich. Admin. Code. r. 299.9302 for not less than three years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal.

During the inspection of records, there was no documented specific waste determination that represented the paint usage in both parts washer (WA-01 and WA-02) spent solutions (solvent (naphtha), and aqueous – Armakleen respectively). Also, there was no documented waste determination for the spent paint booth fabric filters that are disposed of in the general trash at Ford Motor – Rawsonville.

At this time, EPA is not requiring Ford Motor - Rawsonville to apply for a Michigan hazardous waste storage license so long as it immediately establishes compliance with the conditions for a license exemption outlined in paragraph 1, above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above license exemption condition and hazardous waste determinations and recordkeeping requirements. You should submit your response to Bryan Gangwisch, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Gangwisch, of my staff, at (312) 886-0989 or at gangwisch.bryan@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Tim Sonnenberg, MDEQ – Jackson District Office
sonnenbergt1@michigan.gov

John Craig, MDEQ – Lansing HQ Office
craigj@michigan.gov

Lonnie Lee, MDEQ – Lansing HQ Office
leel@michigan.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR-8J
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: Ford Motor Company – Rawsonville Plant

EPA ID No.: MID005379888

ADDRESS: 10300 Textile Road
Ypsilanti, MI 48197

DATE OF INSPECTION: January 15, 2015

EPA INSPECTOR: Bryan Gangwisch

PREPARED BY: Bryan Gangwisch
Environmental Scientist
Compliance Section #2

1/30/15
Date Completed

ACCEPTED BY: Julie Morris, Chief
Compliance Section #2

2/6/15
Date

Purpose of Inspection

This inspection was an evaluation of Ford Motor Company – Rawsonville Plant (Ford Motor - Rawsonville), and its compliance with hazardous waste regulations found at Michigan Administrative Code (MAC) and the Code of Federal Regulations (CFR). I performed the inspection with Tim Sonnenberg of the Michigan Department of Environmental Quality (MDEQ). The inspection was a Federal lead RCRA Compliance Evaluation Inspection (CEI).

Participants

Kimberly M. Gamble, Environmental Compliance Engineer	Ford Motor - Rawsonville
Ann McCormick, Senior Environmental Compliance Engineer	Ford Motor - Rawsonville
Mark Wherrett, Senior Environmental Compliance Engineer	Ford Motor - Rawsonville
Mark Ripper, Contractor to Ford Motor	Heritage
Mike Gullen, Contractor to Ford Motor	Heritage
Bryan Gangwisch, Environmental Scientist	U.S. EPA
Tim Sonnenberg, Environmental Quality Analyst	MDEQ

Introduction

We arrived at the site on January 15, 2015, at approximately 9:00 a.m. The weather consisted of sunny conditions with light wind, and an ambient air temperature of approximately 7 degrees Fahrenheit. We asked for listed contact Kim Gamble from the security gate. We then watched the facility safety video. As Ms. Gamble arrived, we introduced ourselves, presented our inspector credentials and identification, and described the purpose of the inspection and the process by which we intended to conduct the inspection. We were led to a conference room. Ms. Gamble and Mr. Ripper provided us with a verbal description of the site, led the tour throughout the facility, and then attempted to provide us with the records we requested for review.

Site Description

During the opening conference Ms. Gamble or Mr. Ripper stated all of the following unless otherwise noted: The facility was constructed in the mid-1950s and the waste water treatment operation was added in the 1970s. The facility operates as a manufacturer of automotive components parts plant. The following operations/departments comprise the facility: air intake filters; coil-on-plug; lithium ion battery; carbon canister; modular fuel pump; transmission oil pump, sequencing and re-packaging of parts. There are approximately 800 employees at this facility that work three shifts typically.

The waste water treatment operation consists of three 230,000-gallon tanks, which utilize the Modified Windsor Method to treat waste water generated from the facility. A waste water treatment cap (oily layer) is utilized in this method. Ford Motor - Rawsonville has an industrial discharge permit regulated by the City of Ypsilanti. Ford Motor - Rawsonville also has an NPDES regulated by MDEQ for storm water discharge to Ford Lake. The facility also operates under a Title V air permit.

Ford Motor - Rawsonville was operating as a large quantity generator at the time of the inspection according to facility personnel and the facility's waste generation rate. There were two hazardous waste container storage areas observed at the facility at the time of the inspection. There was several satellite accumulation areas (SAA) observed at the time of the inspection. There were no hazardous waste tanks at the time of the inspection.

There were no ponds or lakes located on the facility property. There were two underground product diesel tanks at the facility.

The main waste streams that are regularly generated at Ford Motor - Rawsonville consist of: waste water treatment cap (skim); spent aerosol cans; spent calibration fluid; spent parts washer solvent (naphtha and mineral spirits); spent solvents; waste paint and solvent; broken fluorescent bulbs; spent fabric paint booth filters; spent solvent wipes; spent primer; spent contamination fluid; oily rags and absorbents; and spent epoxy resin. The hazardous waste codes associated with the main hazardous waste types that are generated at Ford Motor - Rawsonville consist of: D001, D005, D008, D018, D019, D028, D029, D030, D032, D033, D034, D035, D036, D038, D039, D040, D042, D043, and F003. Ford Motor - Rawsonville's spent fluorescent bulbs are picked up for recycling by Cleanlites Recycling, Inc. The facility's generated used oil is sent to waste water treatment for utilization in the treatment method. The facility's scrap cardboard is picked up for recycling by Taylor Recycling (Taylor, Michigan). The facility's scrap metal is picked up for recycling by Ferrous Processing and Trading Company (Detroit, Michigan). Ford Motor – Rawsonville's spent universal waste batteries and electronic waste is picked up for recycling by Global Electric Electronic Processing (GEEP) (Redford, Michigan).

Site Tour

A physical walk-through of the facility was conducted at approximately 10:50 a.m. We started at the Main Shop. There were two containers that contained spent batteries. Both containers were labeled as "Universal Waste Batteries", were dated 9/10/14, and were closed.

Next, we inspected the Paint Booth. There was one SAA that consisted of one 30-gallon container. The container was labeled as "Hazardous Waste", "Waste Aerosols", and "D001, D005, D035, and D039", and was closed. There was a separate SAA that consisted of one 55-gallon drum that was situated on a spill containment pallet. The drum was labeled as "Hazardous Waste" and "D001, D005, D035, F003, and U239", and was closed. A picture was taken. Ms. Gamble stated that the spent paint booth fabric filters are disposed of in the general trash. There was a spill kit in the vicinity. There was one 55-gallon drum that contained product mineral

spirits as stated by Mr. Ripper. There was one solvent parts washer (WA-01) and one aqueous (for latex paints) parts washer (WA-02). A picture of both parts washers was taken. There was a separate SAA that consisted of one 55-gallon drum. The drum was labeled as "Hazardous Waste", "Lead Paint Chips/Debris", and "D008", and was closed.

At the Air Induction System area, there was no waste at the time of the inspection. Cardboard is generated from this area as stated by Ms. Gamble.

Next, we inspected the Modular Fuel Pump area. There was one 55-gallon drum that contained product Dowtherm as stated by Ms. Gamble. There was one 55-gallon drum that was situated on a spill containment pallet, which was labeled as "Non-Hazardous Waste" and "Used Glycol", and was closed. There was one 30-gallon container that was labeled as "Non-Hazardous Waste" and "Plant Oily Absorbent and Oil Filters", and was closed. There was one 55-gallon drum that was situated on a spill containment pallet, which was labeled as "Non-Hazardous Waste" and "Carbon Mod Pump", and was closed. There one SAA that consisted of one 55-gallon drum that was situated on a spill containment pallet. The drum was labeled as "Hazardous Waste", "Calibration Fluid and Rags", and "D001", and was closed. There was a separate SAA that consisted of one 30-gallon container that was situated on a spill containment pallet. The container was labeled as "Hazardous Waste", "Waste Aerosols", and "D001, D005, D035, and D039", and was closed.

At the Battery Department, there was one 15-gallon container that was labeled as "Universal Waste" and "Alkaline Batteries", was dated 9/10/14, and was closed.

Next, we inspected the Carbon Canister area. There was one 55-gallon drum that contained non-hazardous waste as stated by Mr. Ripper. The drum was labeled as "Non-Hazardous Waste" and "Carbon Can", and was closed.

At the Coil-On-Plug area, there was one SAA that consisted of one 55-gallon drum that was situated on a spill containment pallet. The drum was labeled as "Hazardous Waste", "Waste Flammable Liquids", and "D001, F003", and was closed. There was one 55-gallon drum that was situated on a spill containment pallet, which was labeled as "Non-Hazardous Waste" and "Plant Oily Absorbent", and was closed. There was one 55-gallon drum that was labeled as "Non-Hazardous Waste" and "Carbon", and was closed. There were two 55-gallon drums that were labeled as "Non-Hazardous Waste" and "Spent Epoxy", and were closed. There was a safety shower in the vicinity.

Next, we inspected the Central Maintenance area. There was one 55-gallon drum that was labeled as "Non-Hazardous Waste", "Carbon", and "Liftkleen", and was closed.

At the Transmission Oil Pump area in the Contamination Lab, there was one SAA that consisted of one 55-gallon drum that was situated on a spill containment pallet. The drum was labeled as "Hazardous Waste" and "D001, D018, D019, D028, D029, D030, D032, D033, D034, D036, D038, D039, D040, D042, and D043", and was closed. There was one 55-gallon drum that

contained product solvent as stated by Mr. Ripper. The drum was labeled as "Novec". There was one aqueous (mineral spirits) parts washer as stated by Mr. Ripper.

Next, we inspected the Transmission Oil Pump Machining area. There was one SAA that consisted of one 55-gallon drum that was situated on a spill containment pallet. The drum was labeled as "Hazardous Waste", "Spent Alcohol and Wipes", and "D001", and was closed. Back at the Central Maintenance area, there was one 15-gallon container that was labeled as "Universal Waste" and "Waste Batteries", was dated 9/10/14, and was closed. There was one SAA that consisted of one 55-gallon drum that was situated on a spill containment pallet. The drum was labeled as "Hazardous Waste", "Spent Epoxy Clean-Up", and "D001, F003", and was closed. There was one 55-gallon drum that was situated on a spill containment pallet. The drum was labeled as "Non-Hazardous Waste" and "Oily Rags/Absorbents", and was closed. There was a separate SAA that consisted of one 55-gallon drum. The drum was labeled as "Hazardous Waste", "Propane/Butane Gas Cylinders", and "D001", and was closed. There was separate SAA that consisted of one 30-gallon container. The container was labeled as "Hazardous Waste", "Waste Aerosols", and "D001, D005, D035, D039", and was closed.

Next, we inspected the Q7 90-Day Pad. There was one 5-gallon container that was labeled as "Hazardous Waste", "Lab Pack Aerosols", "D001, D005, D035, D039", was dated 1/5/15, and was closed. There was one 55-gallon drum that was labeled as "Used Oil", and was closed. There were three 55-gallon drums that were labeled as "Non-Hazardous Waste", and were closed. There was one 55-gallon drum that was labeled as "Hazardous Waste", "Calibration Fluid and Rags", and "D001", was dated 1/8/15, and was closed. The drum was situated partially off the secondary containment grate. A picture was taken. There were seven 55-gallon drums that were labeled as "Non-Hazardous Waste" and "Carbon", and were closed. There was one 55-gallon drum that was labeled as "Non-Hazardous Waste", "Plant Oil Filters and Absorbents", and was closed. There was a spill kit, a mobile spill kit, decontamination equipment, and a fire extinguisher in the vicinity. The employees who inspect this hazardous waste storage area are equipped with cell phones and two-way radios as stated by Ms. Gamble and Mr. Ripper. This area was also bermed and equipped with secondary containment. Aisle space was sufficient. The entire facility is equipped with fire suppression as stated by Mr. Ripper.

At the Refrigeration Crib, there was one 55-gallon drum that was labeled as "Non-Hazardous Waste" and "Used Refrigerant Oil", and was closed.

The inspectors broke for lunch and left the facility at approximately 12:55 p.m.

The inspectors arrived back at the facility at approximately 2:00 p.m.

Next, we inspected the Paint House. There was one 55-gallon drum that was situated on a spill containment pallet. The drum was labeled as "Non-Hazardous Waste", and was closed. A picture was taken. The drum contained calibration fluid wipes as stated by Ms. Gamble. Ms. Gamble and Mr. Ripper also stated that this waste stream had been recently analyzed and the drum was pending waste characterization. There were several cans and totes that contained product paint as stated by Ms. Gamble.

At the Garage, there was one used oil tank that was labeled as "Used Oil." All of the sumps in the Garage were blind as stated by Ms. Gamble. There was one 30-gallon container that was labeled as "Used Oil." There was one 55-gallon drum that was situated on a spill containment pallet, which was labeled as "Non-Hazardous Waste" and "Diesel Fuel Filters", and was closed. There was one 55-gallon drum that was situated on a mobile cart, which was labeled as "Used Oil." There was one 30-gallon container that was labeled as "Used Oil." There was one 55-gallon drum that was situated on a spill containment pallet. The drum was labeled as "Non-Hazardous Waste" and "Diesel and Absorbents", and was closed. There was one 55-gallon drum that was situated on a spill containment pallet. The drum was labeled as "Non-Hazardous Waste" and "Oily Rags/Absorbents", and was closed. There was one 55-gallon drum that was situated on a spill containment pallet. The drum was labeled as "Non-Hazardous Waste" and "Spent Grease", and was closed. There was one 55-gallon drum that was situated on a spill containment pallet. The drum was labeled as "Non-Hazardous Waste" and "Glycol", and was closed. There was one SAA that consisted of one 30-gallon container that was situated on a spill containment pallet. The container was labeled as "Hazardous Waste", "Waste Aerosols", and "D001, D005, D035, D039", and was closed. There was one parts washer (naphtha). There were several containers that contained product grease as stated by Ms. Gamble.

Next, we inspected the Hi-Low Garage. There was one SAA that consisted of one 30-gallon container. The container was labeled as "Hazardous Waste", "Waste Aerosols", and "D001, D005, D035, D039", and was closed. There was one 55-gallon drum that was situated on a spill containment pallet. The drum was labeled as "Non-Hazardous Waste" and "Plant Oily Absorbents and Filters", and was closed.

Inside of the 90-Day Storage Locker # 1, there were four empty drums. There were two 55-gallon drums that contained asbestos materials as stated by Mr. Ripper. Both drums were labeled as "Non-RCRA, Non-Regulated", and were closed.

Inside of the 90-Day Storage Locker # 2, there was no waste at the time of the inspection. There was spill equipment supplies, wooden pallets, and one empty over pack drum.

Inside of the 90-Day Storage Locker # 3, there was no waste at the time of the inspection. This locker was empty.

Inside of the 90-Day Storage Locker # 4, there was one 55-gallon drum. The drum was labeled as "Hazardous Waste", "Contamination Fluid", and "D001, D018, D019, D028, D029, D030, D032, D033, D034, D036, D038, D039, D040, D042, D043", was dated 12/22/14, and was closed. There was a spill kit, a mobile spill kit, decontamination equipment, and a fire extinguisher in the vicinity. The employees who inspect this hazardous waste storage area are equipped with cell phones and two-way radios as stated by Ms. Gamble and Mr. Ripper. All four of the storage lockers were also equipped with secondary containment. Aisle space was sufficient.

Record Review

The review of records was conducted at approximately 2:55 p.m. The recent manifests show that all hazardous waste was sent to the following TSDFs: Safety Kleen Systems, Inc. (ILD980613913); EQ Detroit, Inc. (MID980991566); Petro-Chem Processing Group of Nortru, LLC (MID980615298); Heritage-WTI, Inc. (OHD980613541); Dynecol, Inc. (MID074259565); and Tradebe Recycling (IND000646943). The following transporters were also used: U.S. Industrial Technologies, Inc. (MIK757944491); Nortru Transportation Group, LLC (MID021087275); and Safety Kleen Systems, Inc. (TXR000081205). At least three years of manifests were retained on-site. All LDR notices were available for review for each waste stream. Mr. Ripper typically signs the manifests.

The most recent shipment of universal waste bulbs was documented as of October 14, 2014. The most recent shipment of universal waste batteries was documented as of September 15, 2014.

The facility's industrial user pre-treatment discharge permit (permit No. FR 6-15) with Ypsilanti Community Utilities Authority was reviewed. The current permit was effective as of December 1, 2011, and has an expiration date of June 30, 2015. The facility's NPDES industrial storm water general permit certificate (permit No. MIS410057) with MDEQ was reviewed. The current permit was effective/issued as of August 28, 2014, and has an expiration date of April 1, 2019.

Waste determinations were documented either through analysis/waste profile or generator knowledge and MSDS. The following waste profiles/MSDS were reviewed for the following waste streams: spent epoxy resin, spent alcohol and wipes, aqueous (Armakleen) parts washer solution, premium solvent (naphtha) parts washer solution, carbon liftkleen, mod pump carbon, carbon cop, used glycol and water, carbon (Nuchar Box 1500), carbon (Box 950). The analytical testing data/profile for the waste water treatment oil cap (skim) waste stream was reviewed. Trimatrix Laboratories performed (on 11/12/12) a TCLP analysis on the waste water treatment oil cap (skim) waste stream. The analytical testing data/profile for the refrigerant oil waste stream was reviewed. Trimatrix Laboratories performed (on 3/4/11) a TCLP analysis on the refrigerant oil waste stream. The analytical testing data/profile for the mod pump calibration fluid and rags waste stream was reviewed. Trimatrix Laboratories performed (on 12/17/14) a TCLP analysis on the mod pump calibration fluid and rags waste stream. The letter from Advanced Resources Recovery describing their direct use options for the spent activated carbon source generated from Ford Motor was reviewed. There were no documented specific waste characterizations that represented the paint usage in both parts washer (WA-01 and WA-02) spent solutions (aqueous – Armakleen, and solvent (naphtha). Also, there was no documented waste characterization for the spent paint booth fabric filters that are disposed of in the general trash.

The weekly inspections for all of the hazardous waste container storage areas and the emergency equipment at Ford Motor - Rawsonville were being conducted and were documented. Mr. Ripper typically conducts the weekly inspections.

There was a contingency plan in place for the facility. The listed primary and alternate emergency coordinators were Ms. Gamble and Russ Semon respectively. The plan was last revised on September 15, 2014. There were no descriptions of the capabilities for the gloves that were described in the plan's emergency equipment list.

There were no reported spills or fires related to hazardous waste as stated by Ms. Gamble.

There was a RCRA hazardous waste management training program in place at the facility. The annual RCRA trainings are conducted in-house. Ms. Gamble and Mr. Ripper conduct the in-house RCRA trainings. The RCRA and Department of Transportation (DOT) training certificates were reviewed for Ms. Gamble and Mr. Ripper. The annual RCRA training curriculum and the sign-in sheets that documented that the RCRA trainings were received by employees were available and were reviewed. All of the training documents (names, titles, job descriptions, and type/amount of training) were documented.

Closing Conference

I summarized the RCRA requirements for the following: documented waste characterizations and the contingency plan. The inspection concluded at approximately 6:00 p.m.

Ford Motor - Rawsonville made no claim of confidential business information related to any information obtained, or any pictures taken by U.S. EPA during the inspection.

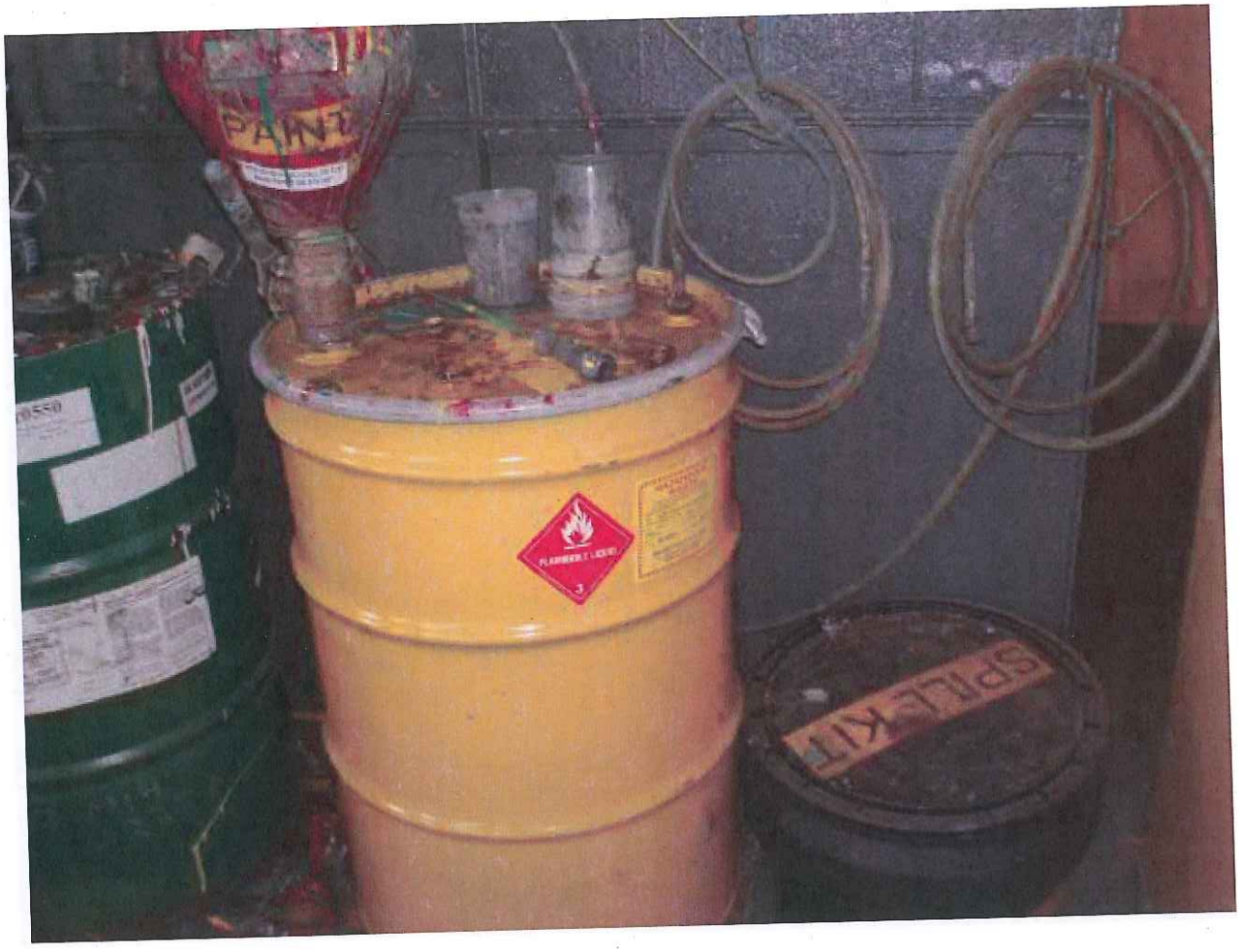
Documents received during this inspection are as follows:

- None

Documents given to Ford Motor - Rawsonville during this inspection are as follows:

- U.S. EPA Small Business Resources handout (compliance assistance)
- Region 5 and State Pollution Prevention contact handout
- Michigan RETAP handout

A photo log is attached consisting of five (5) photos taken by U.S. EPA during the inspection.



1. A view, at the Paint Booth, of a SAA that consisted of one 55-gallon drum that was situated on a spill containment pallet. The drum was labeled as "Hazardous Waste" and "D001, D005, D035, F003, and U239", and was closed.

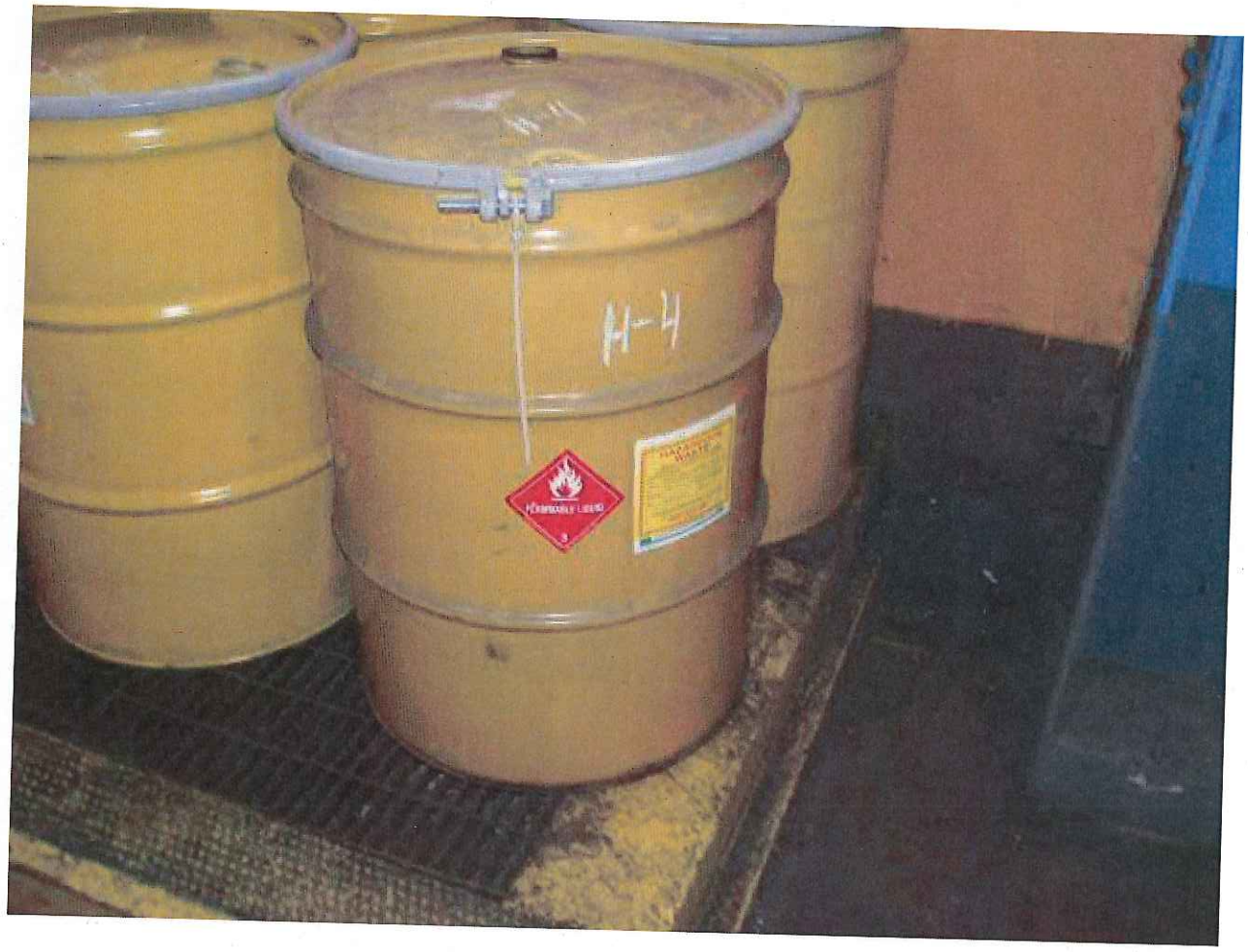
Ford Motor Company – Rawsonville Plant, Ypsilanti, MI
Bryan Gangwisch, U.S. EPA 1/15/15

2. A view, at the Paint Booth area, of the solvent (naphtha) parts washer (WA-01).

Ford Motor Company – Rawsonville Plant, Ypsilanti, MI
Bryan Gangwisch, U.S. EPA 1/15/15

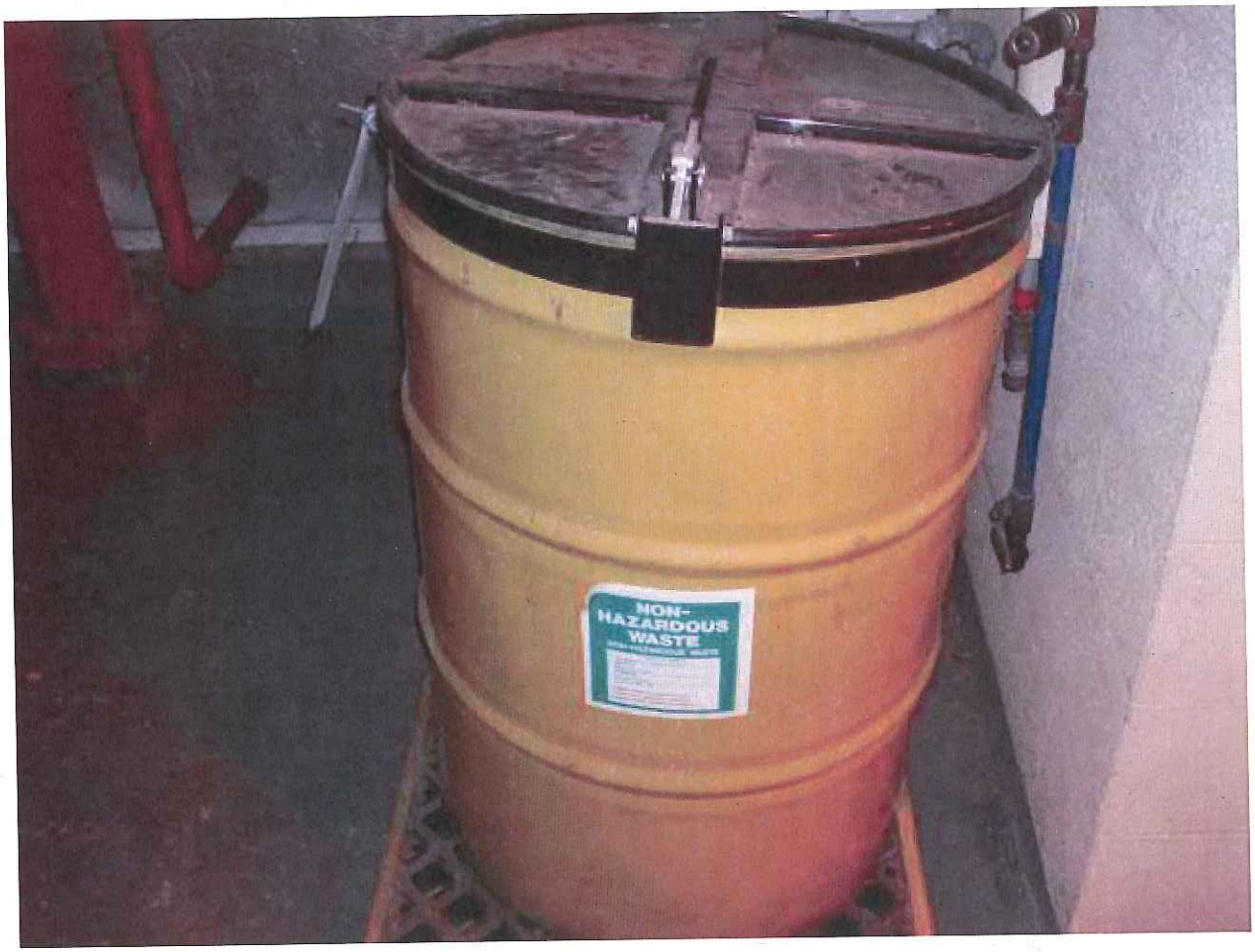
3. A view, at the Paint Booth area, of the aqueous (mineral spirits- for latex paints) parts washer (WA-02).

Ford Motor Company – Rawsonville Plant, Ypsilanti, MI
Bryan Gangwisch, U.S. EPA 1/15/15



4. A view, at the Q7 90-Day Pad, of one 55-gallon drum that was labeled as "Hazardous Waste", "Calibration Fluid and Rags", and "D001", was dated 1/8/15, and was closed. The drum was situated partially off the secondary containment grate.

Ford Motor Company – Rawsonville Plant, Ypsilanti, MI
Bryan Gangwisch, U.S. EPA 1/15/15



5. A view, at the Paint House, of one 55-gallon drum that was situated on a spill containment pallet. The drum was labeled as "Non-Hazardous Waste", and was closed. The drum contained calibration fluid wipes as stated by Ms. Gamble. Ms. Gamble and Mr. Ripper also stated that this waste stream had been recently analyzed and the drum was pending waste characterization.

Ford Motor Company – Rawsonville Plant, Ypsilanti, MI
Bryan Gangwisch, U.S. EPA 1/15/15

Department of Environmental Quality
FULLY REGULATED GENERATOR (FRG) INSPECTION FORM

Facility's Name Ford Motor Company - Rawsonville Plant Part 3 Rules

Date 1/15/15 ID# MID005379888 1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH
Spent aerosols - D001, D005, D035, D039	Paint Booth, Mod Fuel Pump	Varies
Waste paint - D008 D001, D035, F003	Contamination Lab	Varies
Waste solvents - Various codes	Mod Fuel Pump	Varies
Spent contamination fluid - D001	Mod Fuel Pump	Varies
Spent calibration fluid (mags) - D001	Coil - On - Plug	Varies
Flammable liquids - D001, F003	Transmission Oil Pump Machining	Varies
Spent Epoxy Clean-Up - D001, F003		

___ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

WASTE DETERMINATION (Rule 302: 40 CFR 262.11

(NI = Not inspected; N/A = Not applicable)

		YES	NO	
1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11))	262A	[ ]	X	NI N/A
a) copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c))	262D	[ ]	X	NI N/A
b) re-evaluated waste when changes in materials or process? (Rule 302(3))	262A	X	___	NI N/A
2. Did generator have written waste analysis plan if treating wastes on-site? (Rule 306)(1)(d):40 CFR 268.7(a)(5))	262C	[ ]	___	NI N/A

IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)

3. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	262A	X	___	NI N/A

MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)

4. Copies of the manifest readily available for review & inspection? (Section 11138(1)(f))	FSS	X	___	NI N/A
5. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.20(a))	262D	X	___	NI N/A
6. Manifests, prepared by the generator according to instructions in appendix of Part 262 contain the following:				
a) manifest document number (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	X	___	NI N/A
b) generator's name, address, phone & ID # (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	X	___	NI N/A
c) name & ID # of the transporter. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	X	___	NI N/A
d) name, address & ID # of TSDF. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	X	___	NI N/A
e) DOT description of waste(s). (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	X	___	NI N/A
f) quantity of waste, type & # of containers. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	X	___	NI N/A
g) hazardous waste number of the wastes. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	X	___	NI N/A
h) generator signature, initial transporter & date of acceptance. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	X	___	NI N/A
7. NOT APPLICABLE				
8. For out-of-state manifests, if not submitted by designated facility, generator submitted copy of 3rd signature manifest as requested by Director? (Rule 304(2)(c))	262B	X	___	NI N/A
9. Is the transporter used properly registered &/or permitted under Act 138, Sec. 2 (3)? (Rule 304(1)(c))	262B	X	___	NI N/A

NOTE: *For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(g or h).*

10. Using manifest that has expired? (Rule 304(1)(a) : 40 CFR 262.20)	262B	___	X	NI N/A
11. Reportable exceptions (Rule 308(3): 40 CFR 262.42)(a).				
a) number of manifests generator HASN'T receive signed copy from TSD w/in 35 days:				N/A
b) number of manifests generator HASN'T submitted exception reports to RA & DEQ after 45 days:				N/A
12. Facility has written program to reduce volume/toxicity/recycle wastes? (Rule 304(1)(b):40 CFR 262.27(a))	262B	[ ]	___	NI N/A

13. Facility discusses program in place to reduce volume/toxicity/recycle of waste (Rule 304(1)(b): 40 CFR 262.27(a))	262B	X	___	NI N/A

LAND DISPOSAL RESTRICTION REQUIREMENTS
WASTE ANALYSIS AND RECORDKEEPING (Rule 311(1): 40 CFR 268.7))

		YES	NO
14. Did the generator determine if the waste is restricted from land disposal? (Rule 311(1): 40 CFR 268.7(a)(1))			
a) all listed waste	268A	☒	___ NI N/A
b) all characteristic wastes?	268A	☒	___ NI N/A

NOTE: *If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))*

15. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? (Rule 311(1):40 CFR 268.7(a)(2))	268A	☒	___ NI N/A
OR			
16. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (Rule 311(1): (40 CFR 268.7(a)(3))	268A	☐	___ NI (N/A)
OR			
17. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(4))	268A	☐	___ NI (N/A)
OR			
18. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(9))	268A	☐	___ NI (N/A)
19. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3)			
a) EPA hazardous waste #?	268A	☒	___ NI N/A
b) if wastewater or non-wastewater as defined in 268.2(d&f)?	268A	☒	___ NI N/A
c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	268A	☒	___ NI N/A
d) manifest number associated with the shipment?	268A	☒	___ NI N/A
e) waste analysis data, where available?	268A	☒	___ NI N/A
f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	268A	☒	___ NI N/A
UNLESS			
g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9)	268A	☐	___ NI (N/A)
h) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? Rule 311(1): 40 CFR 268 Subpart D & 268.48)	268A	☐	___ NI (N/A)
20. Other than notices for waste exceeding treatment standards, did notices include: (Rule 311(1): 40 CFR 268.7(2)(3)			
a) if the notice is for shipments that meet the standards does the notice include the certification?	268A	☐	___ NI (N/A)
b) if the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?	268A	☐	___ NI (N/A)

NOTE: *An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)*
NOTE: *Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."*

21. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6)	268A	☒	___ NI N/A
22. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR268.7(a)(7))	268A	☐	___ NI (N/A)
23. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8)	268A	☒	___ NI N/A

NOTE: *This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.*

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (RULE 311(1):40 CFR 268.3)

24. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a))	268A	___	☒ NI N/A

TREATMENT STANDARDS (RULE 311(1):40 CFR 268.40)

25. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR268.40(c))	268A	☒	___ NI N/A

BIENNIAL REPORT (Rule 308: 40 CFR 262.41)

26. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)	262D	☒	___ NI N/A
27. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))	262D	☒	___ NI N/A

PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)

		YES NO
28. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a):40 CFR262.30))	262C	co.said__obsrvd__ [X] ___ NI N/A
29. Are waste packages marked & labeled per DOT 49 CFR172 concerning hazardous materials (required before shipping waste off- site)?(Rule 305(1)(b)(c): 40 CFR 262.32(a))	262C	co.said__obsrvd__ [X] ___ NI N/A
30. On containers of 119 gallons or less, is there a warning, generator's name, address, site identification number, manifest tracking number & waste code per DOT 49 CFR172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	262C	co.said__obsrvd__ [X] ___ NI N/A
31. If required (>1000 #'s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	262C	[X] ___ NI N/A

ACCUMULATION TIME (Rule 306: 40 CFR 262.34)

32. If hazardous waste accumulated in containers: (If no, skip to #35)		
a) containers have accumulation date which is clearly visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))	262C	[X] ___ NI N/A
b) container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))	262C	[X] ___ NI N/A
c) is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))	262C	[X] ___ NI N/A
d) has more than 90 days elapsed since date marked? (Rule 306(1)	262C	___ [X] NI N/A

OR

e) one of the following apply:		
i) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	262C	[ ] ___ NI (N/A)
ii) it is F006 waste recycled for metals recovery in compliance with Rule 306 (7) (180 days maximum). Rule 306(7):40 CFR 262.34(g))	262C	[ ] ___ NI (N/A)
iii) it is F006 waste recycled for metals recovery in compliance with Rule 306(7) which must be transported more than 200 miles (270 days max.)? (Rule 306(8):40 CFR 262.34(h)	262C	[ ] ___ NI (N/A)
iv) generator applied for & received extension or exception to accumulate F006 haz waste longer than ii or iii above? (Rule 306(9-10):40 CFR 262.34(i))	262C	[ ] ___ NI (N/A)

The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

f) are containers in good condition? (265.171)	262C	[X] ___ NI N/A
g) are containers compatible with waste in them (265.172)	262C	[X] ___ NI N/A
h) are containers stored closed? (265.173(a))	262C	[X] ___ NI N/A
i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b)	262C	___ [X] NI N/A
j) ignitable & reactive wastes stored 15 meters (50 feet) from property line or written approval obtained from local fire prevention code authority for less than 15 meter? (265.176)	262C	[X] ___ NI N/A
k) are containers inspected weekly for leaks and defects? (265.174)	262C	[X] ___ NI N/A
l) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i))	262C	[X] ___ NI N/A
m) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(i))	262C	[X] ___ NI N/A
n) are incompatible wastes stored in separate containers? (265.177(a))	262C	[ ] ___ NI (N/A)
o) hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	262C	___ [ ] NI (N/A)
p) incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	262C	[ ] ___ NI (N/A)

Rule 306(2) & 40 CFR 262.34(c)(1) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

33. If hazardous waste is being accumulated at the point of generation:		
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2):40 CFR 262.34(c)(1))	262C	[X] ___ NI N/A
b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	[X] ___ NI N/A
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	262C	[X] ___ NI N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	262C	[X] ___ NI N/A
e) are container(s) in good condition? (265.171)	262C	[X] ___ NI N/A
f) are container(s) compatible with waste in them? (265.172)	262C	[X] ___ NI N/A
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	262C	[X] ___ NI N/A
34. If generator exceeds 55 gallons or 1 quart, w/in 3 days does generator, w/respect to that amount of excess waste:		
a) mark the container with the date the excess amount began accumulating? (Rule 306(2): 40 CFR 262.34(c)(2))	262C	[ ] ___ NI (N/A)
b) move to an area with secondary containment, if required? (Rule 306(1): 40 CFR 264.175))	262C	[ ] ___ NI (N/A)

Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.

35. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include		
a) impervious base free of cracks? (264.175(b)(1)) :	262C	[X] ___ NI N/A

b) sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	262C	☒ ___ NI N/A
c) hold 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	262C	☒ ___ NI N/A
d) run-on prevented unless sufficient capacity? (264.175(b)(4))	262C	☒ ___ NI N/A
e) accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)5))	262C	☐ ___ NI (N/A)

NOTE: Closure of Accumulation Area covered under # 53.

36. If accumulating solids, (other than F020,F021,F022, F023, F026, F027), is haz waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c)(1 & 2))	262C	☒ ___ NI N/A
37. Is hazardous waste accumulated in other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? No *Explain any yes answer.*		___ X NI N/A
38. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(1)(e))	262C	☒ ___ NI N/A
39. Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, ground-waters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f))	262C	☒ ___ NI N/A
40. Is hazardous waste accumulated in tanks? No *If so, complete Tank System inspection form.*		___ X NI N/A
41. Is hazardous waste placed on drip pads? No *If so, complete Wood Preserving inspection form*		___ X NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refers to 265.16
PERSONNEL TRAINING (265.16)

42. Did personnel receive training? (265.16)	262C	☒ ___ NI N/A
43. Do personnel training records contain the following:		
a) job title? (265.16(d)(1))	262C	☒ ___ NI N/A
b) job descriptions? (265.16(d)(2))	262C	☒ ___ NI N/A
c) name of employee filling each job? (265.16(d)(1))	262C	☒ ___ NI N/A
d) description of type & amount of both introductory & continued training? 265.16(d)(3))	262C	☒ ___ NI N/A
e) training designed so facility personnel can respond to emergencies? (265.16(a)(3)	262C	☒ ___ NI N/A
f) records of training? (265.16(d)(4))	262C	☒ ___ NI N/A
g) do new personnel receive required training within 6 months? (265.16(b)	262C	☒ ___ NI N/A
h) do training records show personnel have taken part in annual training? (265.16(c))	262C	☒ ___ NI N/A
i) training by person trained in hazardous waste management procedures? (265.16(a))	262C	☒ ___ NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37.
PREPAREDNESS AND PREVENTION (265.30-265.37)

44. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	262C	co.said__obsrvd_ ☒ ___ NI N/A
45. If required, does this facility have the following:		
a) internal communications or alarm systems? (265.32(a))	262C	☒ ___ NI N/A
b) telephone or 2-way radios at the scene of operations? (265.32(b))	262C	☒ ___ NI N/A
c) portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	262C	☒ ___ NI N/A
d) adequate volume of water and/or foam available for fire control? (265.32(d))	262C	☒ ___ NI N/A
46. Testing and Maintenance of Emergency Equipment		
a) owner/operator test & maintain emergency equipment to assure operation? (265.33)	262C	☒ ___ NI N/A
b) has owner/operator provided immediate access to internal alarms? Access to alarm system is applicable **only** if required (40 CFR 265. 32)		
i) when hazardous waste is being poured, mixed, etc. (265.34(a))	262C	☒ ___ NI N/A
ii) if only one employee on the premises while facility is operating. (265.34(b))	262C	☐ ___ NI (N/A)
c) aisle space for unobstructed movement of personnel/emergency equipment? (265.35)	262C	☒ ___ NI N/A
47. Has the facility made arrangements with local authorities? (265.37(a)&(b))	262C	☒ ___ NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to Subpart D, 265.50-265.56.
CONTINGENCY PLAN AND EMERGENCY PROCEDURES (265.50-265.56)

48. Plan implemented whenever fire/explosion/release could threaten human health or the environment? (265.51(b))	262C	☒ ___ NI N/A
49. Does the contingency plan contain the following:		
a) actions personnel must take responding to fires/explosions/unplanned release of hazardous waste? (265.52(a & b))	262C	☒ ___ NI N/A
b) describe arrangements w/ local police, fire, hospitals, contractors, state & local emergency responders for emergency services; (265.52(c)) & (265.37(a)&(b))?	262C	☒ ___ NI N/A

c) name, addresses & phone (office & home) of emergency coordinator? (265.52)(d))	262C	[X] ___	NI N/A
d) list emergency equipment at the facility, including location, physical description & capabilities? (265.52(e)) gloves	262C	[ ] X	NI N/A
e) evacuation plan for personnel w/ signal(s), evacuation routes & alternate evacuation routes. (265.52(f))	262C	[X] ___	NI N/A
50. Does the facility have an Emergency Coordinator? (265.55)	262C	[X] ___	NI N/A
Emergency Coordinator and Emergency Procedures:			
a) emergency coordinator familiar with site operation & emergency procedures? (265.55)	262C	[X] ___	NI N/A
b) emergency coordinator has the authority to carry out the contingency plan? (265.55)	262C	[X] ___	NI N/A
c) if emergency occurred, did the emergency coordinator follow emergency procedures? (265.56)	262C	[ ] ___	NI (N/A)
d) fire/explosion/other release of hazardous waste/haz. waste constituents, could threaten human health or environment or generator has knowledge spill reached surface or ground water, did generator notify MDEQ? (Rule 306(1)(d))	262C	[ ] ___	NI (N/A)
51. Contingency plan Amendments and Copies			
a) amended: fails in emergency; changes in regulations/emergency coordinators/emergency equipment? (265.54)	262C	[X] ___	NI N/A
b) copies of plan on site and sent to local emergency organizations? (265.53)	262C	[X] ___	NI N/A

Rule 309 refers to 262, Subpart E except 262.54 & 262.55

INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)

52. Has the facility imported or exported hazardous waste?		___ X	NI N/A
a) exporting, has the generator:			
i) notified the Administrator in writing <12 months prior to shipment? (Rule 309(1): 40 CFR 262.53(a))	262E	[ ] ___	NI (N/A)
ii) receiving country consented to accept waste. (Rule 309(1): 40 CFR 262.52(b))	262E	[ ] ___	NI (N/A)
iii) has copy of EPA Acknowledgment of Consent. (Rule 309(1): 40 CFR 262.52(c))	262E	[ ] ___	NI (N/A)
iv) complied with manifest requirements in Rule 309(2)(a-h).	262E	[ ] ___	NI (N/A)
v) if required, was an exception report filled. (309(3)(a-c))	262E	[ ] ___	NI (N/A)
b) importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	262F	[ ] ___	NI (N/A)

Rule 306(1)(g) and 40 CFR 262.34(a)(1) refers to 40 CFR 265.111 & 265.114

ACCUMULATION AREA CLOSURE (265.111 & 265.114)

53. The accumulation area must be closed in a manner that:			
a) minimizes need for further maintenance (Rule 306(1)(g): 40 CFR 265.111(a))	262C	[ ] ___	NI (N/A)
b) controls/minimizes/eliminates, to protect human health & environment, the escape of haz. waste or hazardous waste constituents, leachate, run-off to ground/surface waters and air. (Rule 306(1)(g): 40 CFR 265.111(b))	262C	[ ] ___	NI (N/A)
c) all contaminated equipment, structures, and soil properly disposed of. (Rule 306(1)(g): 40 CFR 265.114)	262C	[ ] ___	NI (N/A)

COMMENTS:

1/15/15 Ford Motor Company - Rawsonville MID005379888

Inspection Checklist for Subpart CC: Air Emission Standards (Containers)

Item # 40 CFR:

CC-1	265.1080	**Do any of the following exclusions apply? If yes, please circle.**	YES	NO

Applicability: The air emission requirements apply to units subject to subpart I * unless the following apply (circle if applicable):

1. Waste was placed in unit prior to Oct. 6, 1996, and none has been added since.
2. The container capacity is less than .1 cubic meter (26 gallons)
3. A unit (e.g. tank) has stopped adding waste and is undergoing closure
4. The unit is used solely for onsite treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program
5. The unit is used solely to manage radioactive mixed waste
6. The unit is regulated by and operates in accordance with Clean Air Act regulations

***Note: 1. Satellite containers are exempt 2. CESQG's and SQG's are exempt**

CC-2	265.1083	**Do any of the following exemptions apply? If yes, please circle**	YES	NO

General Standards: The owner/operator must control air emissions from waste management units except the unit is exempt if (please circle if applicable):

1. All hazardous waste entering the unit has an average VO concentration at the point of origination less than 500 parts per million by weight (waste determination required)
2. The organic content of all waste entering the unit has been reduced by one of the 8 acceptable destruction or removal processes.
3. The unit is a tank used for certain biological treatment
4. The hazardous waste placed in the unit meets the LDR numerical concentration limits or has been treated using the specified LDR treatment technology (for organics)
5. The unit is a tank used for bulk feed to an incinerator and meets certain requirements

CC-3	265.1084	**Waste Determination:**	Determination Not Needed	Determination Needed

Was the VO concentration properly determined for each waste which the facility manages in a unit which does not meet Subpart CC requirements? The concentration must be determined by either direct measurement or knowledge. Please see 265.1084 for specific requirements for measurement and knowledge. Determination is not needed for waste managed in containers which meet standards. It may be necessary to evaluate container management prior to requiring VO concentration determination.

#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency	NA	NI	OK	DF

CONTAINER MANAGEMENT 265.1087

Level 1	Level 2	Level 3
Larger than 26.4 gallons and less than or equal to 122 gallons, or larger than 122 gallons and do not manage H.W. in light material service	Larger than 122 gallons and manage H.W. "in light material service" (definition at 265.1081)	Larger than 26.4 gallons and treat H.W. by a stabilization process

			NA	NI	OK	DF
CC-4	265.1087	**Controls**				

One of the following: -Use containers that meet DOT requirements -Use a cover and control with no visible gaps, holes or other open spaces into the interior of the container -Use organic vapor suppression on or above the container 265.1087(c)	One of the following: -Use containers that meet DOT requirements -Use containers that operate with no detectable emissions (method 21) -Use containers that are demonstrated to be vapor-tight within the last 12 months (method 27) 265.1087(d)	-Containers used to stabilize H.W. with volatile organics greater than 500 ppm -For waste stabilized in a container either: 1.container must be vented directly to a control device; or 2.container is vented inside an enclosure which is exhausted through a closed vent to a control device -Conservation vents are not allowed 265.1087(b)(2)

Level 1		Level 2	Level 3			
#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency		NA	NI	OK	DF
CC -5	265.1087	Waste transfer requirements				
No waste transfer requirements apply		-Waste transfer requirements apply regardless of container alternative used in level 2 -Transfer waste into or out of a container in such a manner as to minimize exposure of the waste to the atmosphere. Acceptable methods include a submerged fill pipe, vapor recovery system, or fitted opening with a line purge 265.1087(b)(3)	Not applicable			
CC-6	265.1087	Operating requirements	NA	NI	OK	DF
The covers, openings, and closure devices should be closed except: 1. When transferring H.W. in and out of the containers 2. between batch transfer not exceeding 15 minutes between transfer (note: if the person performing the transfer leaves the area, or the process shuts down, the container must be closed) 3. While performing sampling and equipment access 4. Conservation and safety vents are allowed Containers may be open while performing sampling or equipment access Safety valves and conservation vents may be used if normally left in close position A cover need not to be on a RCRA empty container, as defined in 40 CFR 261.7 265.1087(c)(3), (d)(3)			-If the vapors are directly vented to a control device, there are specific design and operating criteria that must be met same as tanks that have closed vent and control device systems -If an enclosure is used, the enclosure must meet the design and operating criteria specified in "Procedure T-Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR 52.741 The container, enclosure, control device or closed vent system may have safety relief devices.			
CC-7	265.1089	Inspection requirements	NA	NI	OK	DF
Minimal inspection required: When facility accepts container and it is not emptied within 24 hours If wastes are stored greater than a year, then visually inspect once a year If inspections are required, facility must develop written plan and schedule to perform inspection 265.1087(c)(4), (d)(4)			Inspection requirements are the same as for tanks			
C- 8	265.1087	Repair requirements	NA	NI	OK	DF
When a defect is detected; attempt to repair within 24 hours must be made and: Repair within 5 calendar days or empty and remove the container from service Do not use until defect is repaired 265.1087(c)(4), (d)(4)			Necessary corrective measures shall be immediately implemented to ensure that the control device is operated in compliance			
- 9	265.1090	Recordkeeping requirements	NA	NI	OK	DF
container exceeds gallons and does meet DOT dards, records cating that the ainer is not aging H.W. in material service		Since Level 2 waste is "in light material service", no records need to be kept	Depends upon how the organic emissions are vented: -If an enclosure is used, records must be maintained for the most recent set of calculations and measurements performed to verify that the enclosure meets the criteria of a permanent total enclosure (Procedure T) -Records for the closed vent and control device system are the same for those used on tanks(265.1090)(e)			

DEQ

Department of Environmental Quality, Waste and Hazardous Materials Division

USED OIL INSPECTION FORM – GENERATORS

Facility's Name Ford Motor Company - Rawsonville Plant Part 8 Rules

Date 1/15/15 ID# MID005379888 1994 PA 451

Note: *Used oil is defined as "any oil which has been refined from crude oil, or any synthetic oil which has been used and as a result of use, is contaminated with physical or chemical impurities." R 299.9109*

APPLICABILITY (Rule 809)

NI – Not Inspected, N/A – Not Applicable

		YES	NO
1. Does the facility generate used oil and any of the following materials which are subject to regulation as used oil:		X	
a) mixture of used oil and hazardous waste generated by a CESQG regulated pursuant to Rule 205? (Rule 809(1)(a))	UOA		X
b) material that contains or is otherwise contaminated w/ used oil & is burned for energy recovery? (Rule 809(1)(b))	UOA		X
c) used oil that is drained/removed from materials that contain or contaminated w/ used oil? (Rule 809(1)(c))	UOA	X	
d) mixture of used oil and fuel? (Rule809(1)(d))	UOA		X
e) material which is produced from used oil & is burned for energy recovery? (Rule 80991)(e))	UOA		X
f) used oil that is burned for energy recovery & any fuel produced from used oil by processing, blending or other treatment & exceeds the following: (Rule 809(1(f))			
i) maximum arsenic concentration of 5ppm	UOA		X
ii) maximum cadmium concentration of 2ppm	UOA		X
iii) maximum chromium concentration of 10ppm	UOA		X
iv) maximum lead concentration of 100ppm	UOA		X
v) minimum flash point of 100 degrees Fahrenheit	UOA		X
vi) maximum total halogen concentration of 4,000ppm	UOA		X
g) recycled and a hazardous waste solely because it exhibits a hazardous characteristic? (Rule 809(1)(g))	UOA		X
h) used oil contains PCB's at any concentration of 50ppm or less? (May also be subject to 40 CFR Part 761) (Rule 809(2)(l))	UOA		X
2. Does the facility generate any of the following which exempts it from regulation as used oil: (may be subject to regulation as a hazardous waste)			
a) mixture of used oil and hazardous waste except as specified in Rule 809(1)(a)? (See question 1.a.) (Rule 809(2)(a))	UOA		
b) used oil including metalworking oils/fluids containing chlorinated paraffin w/ > 1000 ppm total halogens which hasn't been successfully rebutted by demonstrating that it does not contain significant concentrations of halogenated hazardous constituents in 40 CFR Part 261, Appendix VIII? (Rule 809(2)(b))	UOA		
c) metalworking oils/fluids w/ chlorinated paraffin reclaimed through a tolling agreement? (Rule 809(2)(b)(i))	UOA		
d) used oil w/ chlorofluorocarbons from refrigeration units going for reclaim? (Rule809(2)(b)(ii))	UOA		
e) material that contains or is otherwise contaminated w/ used oil from which the oil has been removed?(Rule 809 (2)(c))	UOA		
f) mixture of used oil/diesel fuel that is mixed on used oil generator's site & used in their own vehicles? (Rule 809(2)(d))	UOA		
g) used oil & material derived from used oil that are disposed of or used in a manner constituting disposal? (Rule 809(2)(e))	UOA		
h) used oil re-refining distillation bottoms used as feed stock to manufacture asphalt products? (Rule 809(2)(f))	UOA		
i) wastewater, the discharge of which is subject to §402 or §307(b) of the CWA & is contained w/ de minimis quantities of used oil? (Rule 809((2)(g))	UOA		
j) mixture of used oil/crude or natural gas liquid for insertion into a crude oil pipeline? (Rule 809(2)(h))	UOA		
k) mixture of oil/crude or nature gas liquid w/ less than 1% used oil if being stored/transported to crude oil pipeline or petroleum refinery for insertion into process before crude distillation or catalytic cracking? (Rule 809(2)(i))	UOA		
l) used oil for insertion into petroleum refining process before crude distillation or catalytic cracking w/out prior mixing if used oil constitutes less than 1% of crude oil feed? (Rule 809 (2)(j))	UOA		
m) used oil, unintentionally introduced, is captured by a hydrocarbon recovery system or wastewater treatment system at a petroleum refinery & inserted into the refining process? (Rule 809(2)(l))	UOA		
n) tank bottoms from stock tanks w/mixture of used/crude oil or nature gas liquids? (Rule 809(2)(m)	UOA		
o) used oil produced on vessels from normal shipboard operations while on-ship? (Rule 809(2)(n))	UOA		
p) specification used oil fuel once the facility demonstrates compliance w/ R 299.9815(3)(b),(c)&(f)? (Rule809(2)(o))	UOA		
q) used oil containing polychlorinated biphenyls at 50 ppm or greater? (Rule 809(2)(p))	UOA		V

GENERATOR REQUIREMENTS (Rule 810)

NOTE: *Used oil generator requirements do not apply to: (1) farmers who generate, in a calendar year, an average of 25gallons per month or less from vehicles or machinery used on the farm, or (2) household do-it-yourselfer*

		YES	NO
3. Is the used oil stored in units other than containers or tanks? (Rule 810(4)	UOA	[ ]	[X] NI N/A
a) in good condition? (40 CFR 279.22(b)(1))	UOA	[X]	[ ] NI N/A
b) not leaking (no visible leaks)? (40 CFR 279.22(b)(2))	UOA	[X]	[ ] NI N/A
4. Are all containers & above ground tanks storing used oil labeled/marked "Used Oil"? (40 CFR 279.22(c)(1))	UOA	[X]	[ ] NI N/A
5. Are fill pipes used to transfer used oil into underground tanks labeled/marked "Used Oil"? (40 CFR 279.22(c)(2))	UOA	[ ]	[ ] NI N/A
6. Upon detection of a release does the facility:			
a) stop the release? (40 CFR 279.22(d)(1))	UOA	[ ]	[ ] NI N/A
b) contain the released used oil? (40 CFR 279.22(d)(2))	UOA	[ ]	[ ] NI N/A
c) clean-up and manage the released used oil & other material? (40 CFR 279.22(d)(3))	UOA	[ ]	[ ] NI N/A
d) if necessary to prevent future release, repair/replace any leaking oil containers or tanks? (40 CFR 279.22(d)(4))	UOA	[ ]	[ ] NI N/A

GENERATOR REQUIREMENTS FOR ON-SITE BURNING IN SPACE HEATER
(Rule 810 refers to 40 CFR 279.23)

7. Does facility that burns used oil in oil-fired space heater(s):			
a) burn only used oil generated by the owner/operator or from household do-it-yourselfers? (40 CFR 279.23(a))	UOA	[ ]	[ ] NI N/A
b) burn in heaters designed to have a maximum capacity of not more than 0.5 million BTU per hour?(40 CFR 279.23(b))	UOA	[ ]	[ ] NI N/A
c) have combustion gases vented to the ambient air? (40 CFR 279.23(c))	UOA	[ ]	[ ] NI N/A

GENERATOR REQUIREMENTS FOR OFF-SITE SHIPMENTS OF USED OIL
(Rule 810 refers to 40 CFR 279.24)

8. Does the facility use a transporter with an EPA identification number? (Rule 810 refers to 40 CFR 279.24)	UOA	[ ]	[ ] NI N/A

OR

9. If the facility does not use a transporter w/ an EPA identification number, does it meet one of the following exemptions?			
a) self transportation of small amounts to approved collection centers provided that the generator transports:			
i) the used oil in a vehicle owned by the generator or an employee of the generator? (40 CFR 279.24(a)(1))	UOA	[ ]	[ ] NI N/A
ii) no more than 55 gallons of used oil at one time? (40 CFR 279.24(a)(2))	UOA	[ ]	[ ] NI N/A
iii) to a used oil collection center that is registered, licensed, permitted or recognized by government? (40 CFR 279.24(a)(3))	UOA	[ ]	[ ] NI N/A
b) self transportation of small amounts to aggregation point owned by the generator provided that the generator transports: (40 CFR 279.24(b))			
i) the used oil in a vehicle owned by the generator or an employee of the generator? (40 CFR 279.24(b)(1))	UOA	[ ]	[ ] NI N/A
ii) no more than 55 gallons of used oil at one time? (40 CFR 279.24(b)(2))	UOA	[ ]	[ ] NI N/A
iii) the used oil to a used oil aggregation point that is owned/operated by the same generator? (40 CFR 279.24(b)(3))	UOA	[ ]	[ ] NI N/A
c) used oil is reclaimed and the processor returns the oil to the generator under tolling for use as lubricant, cutting oil, or coolant? (40 CFR 279.24(c))	UOA	[ ]	[ ] NI N/A
i) the contract indicates the type and amount of used oil and frequency? (40 CFR 279.24(c)(10))	UOA	[ ]	[ ] NI N/A
ii) the contract indicates the vehicle used to transport both ways is owned by the processor? (40 CFR 279.24(c)(2))	UOA	[ ]	[ ] NI N/A
iii) the contract indicates the oil will be returned to the generator? (40 CFR 279.24(c)(3))	UOA	[ ]	[ ] NI N/A

USED OIL DISPOSAL (Rule 816)

10. Is used oil that cannot be recycled & is being disposed of & is not a hazardous waste managed in accordance w/ applicable federal & state regulations? (Rule 816(2))	UOA	[X]	[ ] NI N/A
11. Is the used oil used as a dust suppressant? (Rule 816(3))	UOA	[ ]	[X] NI N/A

COMMENTS:-

Department of Environmental Quality
UNIVERSAL WASTE SMALL QUANTITY HANDLER (SQH) INSPECTION

Facility Name Ford Motor Company - Rawsonville Plant Part 2 Rules

Date 1/15/15 I.D. # MID 005 379 888 1994 PA 451

SQH may choose to manage the following as universal waste when they accumulate quantities of 5000 kg (11,000 lbs) or less of all these wastes on site: antifreeze; batteries [except lead acid batteries managed per R 299.9804]; consumer electronics (devices containing circuit boards, liquid crystal display, or plasma display); electric lamps [fluorescent, high intensity discharge (HID), sodium vapor, mercury vapor, neon, metal halide, incandescent lamps, and cathode ray tubes (CRTs) from computers, televisions, etc.]; mercury items: thermostats, mercury switches, mercury thermometers, waste devices containing only elemental mercury; various pesticides; pharmaceuticals.

Yes/No responses that are outside of the parenthesis are violations. (NI - Not Inspected N/A - Not Applicable)

PROHIBITIONS (Rule 228(4): 40 CFR 273.11)		YES	NO
1. Does SQH dispose of universal waste? (Rule 228(4): 40 CFR 273.11(a))	273.B		[X] NI N/A
2. Does SQH dilute or treat universal waste, except responding to releases or managing certain waste when included below? (Rule 228(4): 40 CFR 273.11(b))	273.B		[X] NI N/A

WASTE MANAGEMENT (Rule 228(4): 40 CFR 273.13, 273.14)

ANTIFREEZE: (Rule 228(4))		QTY HANDLED: ____
3. Is antifreeze managed in manner to prevent release by containing it in structurally sound packaging that is compatible w/ contents, & kept closed? Are transport vehicles & vessels managed in the same way? (Rule 228(4)(h))	273.B	[ ] NI N/A
4. Do containers show evidence of leakage, spillage, or damage? If so, are these containers over packed in a container that meets requirements? (Rule 228(4)(h)(ii)(B))	273.B	[ ] NI N/A
5. If tanks are used to store antifreeze, do they meet requirements in 40 CFR 265 Subpart J except 265.197(c), 265.200, & 265.201? (Rule 228(4) (h) (ii) (C). **[USE TANK CHECKLIST]**	273.B	[ ] NI N/A
6. Are containers labeled "UNIVERSAL WASTE ANTIFREEZE" or "WASTE ANTIFREEZE" or "USED ANTIFREEZE"? (Rule 228(4)(h)(iv))	273.B	[ ] NI N/A
7. If a release occurred, was it immediately cleaned up & properly characterized for disposal? (Rule 228(4)(e)(ii))	273.B	[ ] NI N/A

BATTERIES: (Rule 228(4) adopts 40 CFR 273 except 273.10 &273.18(h) requirements)		QTY HANDLED: ____
8. Are batteries managed in way to prevent releases? (Rule 228(4)(a): 40 CFR 273.13(a)	273.B	[X] NI N/A
9. Are batteries that show evidence of leakage, spillage, or damage that could cause leaks put in containers that are kept closed, structurally sound, compatible w/ contents of battery, & lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228(4): 40 CFR 273.13(a)(1))	273.B	[ ] NI N/A
10. Does the handler do any of the following activities w/ batteries as long as the casings of each battery is not breached & remain intact & closed (except to remove electrolyte): sort by type, mix types in container, discharge to remove electric charge, regenerate, disassemble into individual batteries or cells, remove from consumer products, or remove electrolyte? (Rule 228(4)(a): 40 CFR 273.13(a)(2))	273.B	[ ] NI N/A
11. If electrolyte is removed or other wastes generated from activities in item 10, has it been determined whether it is hazardous waste? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] NI N/A
a. If electrolyte or other waste is hazardous waste, is it managed in compliance with Parts 260-272 and Part 111? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] NI N/A
b. If electrolyte or other waste is not hazardous waste, is it managed in compliance with Parts 31, 115 or 121 of 451 & local requirements? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] NI N/A
12. Are batteries or container(s) of batteries labeled w/ either: "UNIVERSAL WASTE-BATTERIES" or "WASTE BATTERIES" or "USED BATTERIES". (Rule 228(4)(a): 40 CFR 273.14(a)) None observed during inspection	273.B	[X] NI N/A

CONSUMER ELECTRONICS: (Rule 228(4))		QTY HANDLED: ____
13. Are electronics managed in a manner that prevents breakage or the release of any universal waste or components of universal waste by containing electronics in packaging that will prevent breakage during normal handling conditions? (Rule 228(4)(f)(i))	273.B	[ ] NI N/A
14. Is packaging in which the electronics are contained labeled either "UNIVERSAL WASTE CONSUMER ELECTRONICS" or "UNIVERSAL WASTE ELECTRONICS"? (Rule 228(4)(f)(ii))	273.B	[ ] NI N/A
15. Have releases been properly contained, & have residues been characterized, & properly disposed? (Rule 228(4)(f)(iii)	273.B	[ ] NI N/A
16. Does handler do anything beyond any of the following: repair electronics for direct reuse(Rule 228(4)(g)(i); remove other univ. wastes from cons. electronics (Rule 228(4)((g)(ii)); remove modular components for reuse (Rule 228(4)(g)(iii)	273.B	[ ] NI N/A

None observed during inspection

ELECTRIC LAMPS: (Rule 228(4) ;273.13(c);273.14(d)		QTY HANDLED:
17. Are lamps crushed or broken and facility trying to manage as universal waste? **(universal waste electric lamps shall not be crushed or broken under MI rule)** (Rule 228(4)(c)(i)) ***Note: different from EPA regulation***	273.B	___ [ ] NI N/A
18. Are lamps managed in a manner to prevent breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with contents of lamps and will prevent breakage, and packaging kept closed? (Rule 228(4(c)(ii))	273.B	[ ] ___ NI N/A
19. Are lamps or packaging containing lamps labeled either "UNIVERSAL WASTE ELECTRIC LAMP(S)" or "WASTE ELECTRIC LAMP(s)" or "USED ELECTRIC LAMP(s)". (Rule 228(4)(c)(iv)) ***Note: different from EPA regulation***	273.B	[ ] ___ NI N/A
20. Are lamp fragments or residues, & all lamps that show evidence of breakage, leakage, or damage that could cause release of mercury or other hazardous constituents to the environment immediately contained in packaging that is structurally sound & compatible w/ content, & kept closed? (Rule 228(4)(c)(iii)) ***Note: different from EPA regulation***	273.B	[ ] ___ NI N/A
21. If lamp fragments or residues are generated, has it been determined whether it is hazardous waste? (Rule 228(4)(c)(iii (B)) ***Note: different from EPA regulation which allows broken lamps to continue to be managed as universal waste***	273.B	[ ] ___ NI N/A
a. If waste is characteristic is it managed in compliance w/ Part 111, Act 451: 40 CFR Part 260-272?	273.B	[ ] ___ NI N/A
b. If waste is not characteristic is it managed in compliance w/ Part 115 of Act 451?	273.B	[ ] ___ NI N/A

MERCURY DEVICES: (Rule 228(4) ; 40 CFR 273.13 & 273.14		QTY HANDLED:
22. Are devices managed to prevent releases? (Rule 228 (4)(d): 40 CFR 273.13(c))	273.B	[ ] ___ NI N/A
23. Are mercury devices that show evidence of leakage, spillage, or damage that could cause leaks placed in a container that is closed, structurally sound, compatible w/ contents of device, & lack evidence of leakage, spillage or damage that could cause leakage, & designed to prevent the escape of mercury by volatilization or other means? (Rule 228 (4)(d): 40 CFR 273.13(c)(1))	273.B	[ ] ___ NI N/A
24. Are mercury devices or containers of mercury devices labeled either "UNIVERSAL WASTE THERMOSTAT(S) " or "WASTE MERCURY THERMOSTAT(S)" or "USED MERCURY THERMOSTAT(S)".(Rule 228 (4)(d): 40 CFR 273.14(d))	273.B	[ ] ___ NI N/A
25. Does handler removing ampules meet the following conditions?		
a. Does facility try to prevent breakage and is doing removal only over a containment device? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(i & ii))	273.B	[ ] ___ NI N/A
b. Does facility have a clean-up system available to transfer spilled material to another container & use it immediately w/ broken or leaking ampules? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(iii & iv))	273.B	[ ] ___ NI N/A
c. Is facility area well ventilated & monitored to ensure compliance w/ OSHA exposure limits? (Rule 228 (4)(d): 40 CFR 273.13(c)(2) (v))	273.B	[ ] ___ NI N/A
d. Does facility have employees familiar w/ proper waste handling & emergency procedures? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	[ ] ___ NI N/A
e. Are removed ampules stored in closed, non-leaking container that is in good condition? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	[ ] ___ NI N/A
f. Are removed ampules packed in container with packing material to prevent breakage? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vii))	273.B	[ ] ___ NI N/A
26. When devices do not contain ampules & handler removes original housings that hold mercury, does handler immediately seal original housing to prevent mercury release & follow all ampule management requirements? (Rule 228 (4)(d): 40 CFR 273.13(c)(3))	273.B	[ ] ___ NI N/A
27. If waste is generated from removal of ampules or housings, or if clean-up residues are generated, is it determined if it is hazardous waste? (Rule 228 (4)(d): 40 CFR 273.13(c)(3)(i))(A&B), 273.13(c)(4)(i)	273.B	[ ] ___ NI N/A
a. If waste is characteristic, is it managed in compliance w/ part 260-272 and Part 111? (Rule 228 (4)(d): 40 CFR 273.13(c)(4)(ii))	273.B	[ ] ___ NI N/A
b. If waste is not hazardous waste, is it managed in compliance w/ Parts 115 & 121 of Act 451, as applicable? Rule 228 (4)(d): 40 CFR 273.13(c)(4)(iii))	273.B	[ ] ___ NI N/A

PESTICIDES: Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h)		QTY HANDLED:
28. Handler prevents releases by containing pesticides in containers that are closed, structurally sound & compatible w/ pesticide, & does not show evidence of leakage, spillage or damage? (Rule 228(4)(a): 40 CFR 273.13(b)(1))	273.B	[ ] ___ NI N/A
29. If original container is in poor condition, is it over-packed in acceptable container? (Rule 228(4)(a): 40 CFR 273.13(b)(2))	273.B	[ ] ___ NI N/A
30. If stored in tank, are requirements of 40 CFR Part 265, Subpart J met except 265.197(c), 265.200, & 265.201? **[USE TANK CHECKLIST]** (Rule 228(4)(a): 40 CFR 273.13(b)(3))	273.B	[ ] ___ NI N/A
31. If stored in transport vehicle or vessel, is it closed, structurally sound & compatible w/ pesticides & shows no evidence of leakage, spillage or damage?? (Rule 228(4)(a): 40 CFR 273.13(b)(4))	273.B	[ ] ___ NI N/A
32. Are pesticides in a container, tank or transport vehicle labeled either "UNIVERSAL WASTE-PESTICIDE(s)" or "WASTE-PESTICIDE(s)" (Rule 228(4)(a): 40 CFR 273.14(b) **[See 273.14(c) if 273.14(b) not possible]**	273.B	[ ] ___ NI N/A

PHARMACEUTICALS: (Rule 228(4)		QTY HANDLED:
33. Are pharmaceuticals managed in a manner to prevent release of any universal waste or components of universal waste by containing pharmaceuticals in structurally sound packaging that is compatible w/ contents & will prevent breakage, & kept closed? Are containers that do not meet these conditions over packed in a container that does? (Rule 228(4)(e)(i))	273.B	[ ] ___ NI N/A
34. Does handler disassemble packaging & sort pharmaceuticals? (Rule 228(4)(e)(iii))	273.B	[ ] ___ NI N/A